1 **STIPULATION** 2 WHEREAS, on August 1, 2024, the Court issued an Order on the dispute over redactions 3 made in Uber's productions pursuant to Pretrial Order No. 5 ("PTO 5") (ECF 767, the "Order"). 4 WHEREAS, the Order provided that: (1) "Uber is not required to remove reductions that 5 were in place at the time documents were produced in previous litigation or investigations"; (2) 6 "Uber shall remove all new redactions applied to employee first and last names [but] may maintain 7 redactions to other PII besides drivers' and employees' names in this production of documents"; 8 and (3) "As a general rule, Uber must produce documents without redactions for relevance. If Uber 9 believes that a limited number of exceptionally sensitive and entirely irrelevant portions of documents warrant special treatment, it must address those documents specifically with Plaintiffs 10 11 and explain what relevance redactions Uber believes should be allowed." 12 WHEREAS, Uber has agreed to remove all redactions based on relevance from its PTO 5 productions. 13 14 WHEREAS, Uber agreed to complete production of PTO 5 documents in accord with the 15 Court's order by August 16, 2024. 16 **THEREFORE**, the parties agree that: The deadline for Uber to complete its productions pursuant to the Order is August 16, 2024. 17 IT IS SO STIPULATED. 18 19 20 DATED: August 9, 2024 Respectfully submitted, 21 By: /s/ Rachel B. Abrams 22 Rachel B. Abrams PEIFFER WOLF CARR KANE 23 **CONWAY & WISE, LLP** 555 Montgomery Street, Suite 820 24 San Francisco, CA 94111 25 Telephone: (415) 426-5641 rabrams@peifferwolf.com 26 Sarah R. London 27 LIEFF CABRASER HEIMANN & **BERNSTEIN** 28

		275 Battery Street, Fl. 29
1		San Francisco, CA 94111
2	2	Telephone: (415) 956-1000
3	3	slondon@lchb.com
		Roopal P. Luhana
4	'	CHAFFIN LUHANA LLP
5	5	600 Third Avenue, Fl. 12 New York, NY 10016
6	5	Telephone: (888) 480-1123
7	7	luhana@chaffinluhana.com
/		Co. Load Course of for Plaintiffs
8	3	Co-Lead Counsel for Plaintiffs
9		SHOOK HARDY & BACON L.L.P.
10		SHOOK HARDT & BACON L.L.T.
		By: /s/ Michael B. Shortnacy
11	1	MICHAEL B. SHORTNACY
12	2	MICHAEL B. SHORTNACY (SBN: 277035)
13	3	mshortnacy@shb.com
		SHOOK, HARDY & BACON L.L.P. 2049 Century Park East, Ste. 3000
14	1	Los Angeles, CA 90067
15	5	Telephone: (424) 285-8330
16	5	Facsimile: (424) 204-9093
		PATRICK OOT (Admitted Pro Hac Vice)
17	/	oot@shb.com
18	8	SHOOK, HARDY & BACON L.L.P. 1800 K St. NW Ste. 1000
19		Washington, DC 20006
20		Telephone: (202) 783-8400
20	)   	Facsimile: (202) 783-4211
21	1	KYLE N. SMITH (Pro Hac Vice admitted)
22	2	ksmith@paulweiss.com
23	3	JESSICA E. PHILLIPS ( <i>Pro Hac Vice</i> admitted)
23		jphillips@paulweiss.com PAUL, WEISS, RIFKIND, WHARTON
24	4	& GARRISON LLP
25	5	2001 K Street, NW
26		Washington DC, 20006 Telephone: (202) 223-7300
		Facsimile: (202) 223-7420
27	7	
28	3	Attorneys for Defendants
		-2-
	STIPLIL ATION REGARDING	Case No. 3:23-md-03084-CRB

STIPULATION REGARDING COMPLIANCE WITH AUGUST 1, 2024 ORDER Case No. 3:23-md-03084-CRB